

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**ROBERT E. BELUE, et al.,
vs. ASBESTOS DEFENDANTS:
A.O. SMITH ELECTRICAL PRODUCTS, et. al.**

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

ROBERT E. BELUE, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.
2:06-CV-1034-WKW

ASBESTOS DEFENDANTS:
A.O. SMITH ELECTRICAL PRODUCTS, et al.,

Defendants.

**JOINDER AND ADOPTION IN
BP AMOCO CHEMICAL COMPANY'S MOTION TO DISMISS**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation and hereby join in and adopt as though fully set forth BP Amoco Chemical Company's Motion to Dismiss for Failure to Comply with Rule 4(m) of the Federal Rules of Civil Procedure or in the Alternative, Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(6) for in the Alternative Motion for More Definite Statement Pursuant to Federal Rule of Civil Procedure 12(e); and Motion to Require Particularity Pursuant to Federal Rule of Civil Procedure 9(b) filed herein on February 6, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation respectfully request this Honorable Court to grant BP Amoco Chemical Company's Motion to Dismiss for Failure to Comply with Rule 4(m) of the Federal Rules of Civil Procedure or in the Alternative, Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(6) for in the Alternative Motion for More Definite Statement Pursuant to Federal Rule of Civil Procedure 12(e); and Motion to Require Particularity Pursuant to Federal Rule of Civil Procedure 9(b) filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 10th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE 019)
AL Bar No. ASB-1485-C19E
Elizabeth B. Padgett (PAD015)
Alabama Bar No. ASB-3936-C60P

Counsel for Foseco, Inc., Maremont Corporation
and Union Carbide Corporation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.

Law Offices of G. Patterson Keahey, P.C.
One Independence Plaza, Suite 612
Birmingham, AL 35209

This 10th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE019)
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